



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217-557-8155

November 1, 2021

977377

Mr. Michael Hirt
Environmental Information Logistics, LLC
446 S. Hawthorne Avenue
Elmhurst, Illinois 60126

Re: 2010300018 – Winnebago County
Interstate Pollution Control – Rockford, Illinois
Fourteenth Year Annual Report
Superfund / Technical Reports

Dear Mr. Hirt:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the *Fourteenth Year Annual Report* for the Interstate Pollution Control Site located in Rockford, Winnebago County, Illinois. It was prepared by Environmental Information Logistics, LLC on behalf of the Interstate Pollution Control/Roto-Rooter ("IPC") Superfund Site Remedial Design/Remedial Action Steering Committee. It was dated September 15, 2021 and was received on September 17, 2021. The Annual Report discusses the results of long-term natural attenuation monitoring for the current monitoring period (December 2020 through June 2021), and is meant to satisfy the requirements of the approved Groundwater Monitoring Work Plan, the First Year Annual Report/Technical Memorandum, and the Consent Decree dated March 1, 2006.

The Summary and Conclusions Section reports the results to date indicate that the total Volatile Organic Compound (VOC) load in the downgradient wells has decreased approximately 78% since natural attenuation monitoring began in 2007. It also reports that the cumulative concentrations of TCE and 1,1,1-TCA have decreased approximately 81% since natural attenuation monitoring began. It then concludes there is no site-related groundwater degradation in either the site monitoring wells or in the river wells. Illinois EPA agrees with those statements and believes these results reflect the final remedy is functioning as originally intended.

The Recommendations Section provides three (3) proposed recommendations. Illinois EPA will address each below.

- 1) It is recommended the Soil Vapor Extraction (SVE) system be excluded from further consideration as a contingency remedy and the soil remediation at the site be recognized as complete. The Agency cannot agree to exclude the SVE system from further consideration at this time. We can agree that the final remedy is in place and working as

2125 S. First Street, Champaign, IL 61820 (217) 278-5800
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000
595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

designed. However, as the final remedy includes monitored natural attenuation, the groundwater sampling must continue, and the remedial action is therefore not complete.

- 2) It is recommended the groundwater monitoring frequency be reduced to once every five years, to support ongoing Five-Year Reviews. Illinois EPA cannot agree to this. The Agency will agree to reduce the groundwater monitoring frequency to an annual basis beginning with the 15th year of monitoring. This monitoring should occur during the sampling event which shows the most variability.
- 3) It is recommended the State and IPC Settling Defendants begin conversations to determine how the Consent Decree can be updated to recognize degradation in groundwater is due to upgradient sources and long-term monitoring of groundwater degradation caused by others is not the responsibility of the IPC Settling Defendants. Illinois EPA does not agree that all groundwater degradation at the site is currently and will continue to be caused only by others. Groundwater monitoring at this site is being conducted as the Monitored Natural Attenuation portion of the final remedy and must continue in accordance with the Consent Decree, with the modification noted above.

If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 557-8155 or via electronic mail at brian.conrath@illinois.gov.

Respectfully,



Brian A. Conrath
Remedial Project Manager
Federal Site Remediation Section
Bureau of Land


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CC: Ms. Karen Cibulskis (USEPA)
Mr. Thomas D. Lupo

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Interstate Pollution Control
Rockford, Illinois
November 1, 2021
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bcc: Bureau File
Christopher Hill (FSRS)

CC addresses:

Karen Cibulskis
Remedial Project Manager
Superfund Division, SR-6J
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Mr. Thomas D. Lupo
Williams Montgomery & John
20 North Wacker Drive, Suite 2100
Chicago, Illinois 60606